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POSTAL REGULATORY  
COMMISSION  
OFFICE OF THE SECRETARY

East Camden & Highland Railroad

Tuesday, July 26, 2011

A2011-30

Postal Regulatory Commission  
901 New York Avenue NW  
Suite 200  
Washington, DC 20268-0001

Postal Regulatory Commission,

Please consider this as a formal appeal to the Final Determination to close the East Camden Branch Post Office – Docket Number 1438579-71701.

The above referenced document outlining the rationale behind closing the East Camden Branch Post office is predicated upon numerous errors – both in ascertaining the community statistics and the base assumptions related to projected cost savings. By example:

1. East Camden is not a part of Camden. It is a non-contiguous, separate community which administers its own city government as well as police and fire protection. (All of this information was presented to U.S. Post Office personnel, in an April 26<sup>th</sup> conference call, that included U.S. Senator John Boozman and his staff and, again, in a face to face meeting with U.S. Post Office personnel at Highland Industrial Park in East Camden on May 11, 2011).
2. The attempt at portraying East Camden as a small outpost community discounts the fact that not only does the local post office serve a residential base but the industrial park is home to many major Arkansas employers including:

***Aerojet-General Corporation***

***American Rheinmetall Defence***

***Armtec Defense Products***

***Austin Powder Company***

***CSI Construction***

***Day & Zimmermann, Inc.***

***East Camden & Highland Railroad***

***General Dynamics Armament & Technical Products, Inc.***

***Highland Industrial Park, Inc.***

***Lockheed Martin Missiles & Fire Control***

***National Technical Systems***

***R&R Trucking Company, Inc.***

***Raytheon Missile Systems Company***

***Spectra Technologies LLC***

3. The primary economic justification put forth is the elimination of the lone employee but that logic simply doesn't hold up to any scrutiny. First, by your own statement "Any employee assigned to this facility will be relocated with the Post Office." Secondly, to replace the existing employee the proposal is for those duties to be handled by a rural and/or contract carrier. So we're not saving the benefits/expenses of one employee (relocating or shifting his reporting site) and we're adding employee(s) to handle his duties. I've been involved with transportation and logistics for over thirty-five years and I cannot see the logic behind the stated justification. For example, Camden proper covers approximately 17 square miles and is currently served by two postal facilities employing numerous employees engaged solely in mail delivery. East Camden and the associated industrial park cover 27 square miles and while it's a given that the number of delivery receptacles are substantially less the sheer magnitude of the delivery area contradicts any thought of handling it with one employee. If my reasoning is flawed I would welcome any empirical analysis that you might present demonstrating the cost/benefits of utilizing a rural and/or contract carrier.
4. The lease on the East Camden facility expires April 30, 2015 which means there will be no cost savings relative to this lease until expiration.

To summarize your closure document you've misstated most of the pertinent facts regarding the service area, discounted the presence of the numerous major industries, shifted an existing employee (no savings), hired additional people to assume his duties and will continue to pay for the infrastructure for four additional years. I cannot make the analysis or associated figures work on any level.

It is admirable to approach your business with the idea of reducing unnecessary expenditures, eliminating waste and ultimately saving money for the taxpayer. But the underlying foundation of the report is severely flawed and needs to be reevaluated.

Please do not undertake a path that diminishes service while actually adding cost.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Bruce Coffey', with a stylized, flowing script.

Bruce Coffey  
President  
EAST CAMDEN & HIGHLAND RAILROAD